



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

July 11, 2022

BY ECF

The Honorable Nelson S. Román
United States District Judge
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: United States v. David Kaufman, 20 Cr. 577 (NSR)

Dear Judge Román:

On or about April 14, 2022, the Court sentenced the defendant following his guilty plea to stalking in violation of a court order under 18 U.S.C. §§ 2261A and 2. During the sentencing proceeding, the Court permitted the Government to confer with the defense and submit an amended order of protection including additional victims. Enclosed, the Government respectfully submits: (1) an amended order of protection; and (2) an amended restitution order. On or about May 25, 2022, on behalf of the parties, the Government submitted the attached amended orders to the Court. The Government respectfully requests that the Court issue the attached orders—in particular, the amended restitution order.

As to the amended restitution order, under 18 U.S.C. § 3664(d)(5), the Court's "final determination of the victim's losses" typically does not "exceed 90 days after sentencing." 18 U.S.C. § 3663(d)(5). "If the victim subsequently discovers further losses, the victim shall have 60 days after discovery of those losses in which to petition the court for an amended restitution order." *Id.* Here, the amended restitution order reflects losses incurred on Victim-1 in connection with her attendance and participation at sentencing in this matter on or about April 14, 2022. After sentencing, the Government conferred with the defense, and the defendant consented to the amended restitution order. By statute and upon consent, the amended restitution order is thus proper, and the Government respectfully requests that the Court issue the order.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/
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cc: Michael Burke, Esq. (by ECF)